

Todd Pickles (SBN 215629)
Henry Stroud (SBN 342479)
GREENBERG TRAURIG, LLP
400 Capitol Mall, Suite 2400
Sacramento, CA 95814
Telephone: (916) 442-1111
Facsimile: (916) 448-1709
picklest@gtlaw.com
henry.stroud@gtlaw.com

Attorneys for Plaintiffs/Counter-Defendants
E.Y. OROT ASSETS LTD. and
OMEGA ECO DIAMONDS LTD.

Jeffrey E. Tsai (SBN 226081)
James S. Davidson (SBN 347622)
DLA PIPER LLP (US)
555 Mission Street, Suite 2400
San Francisco, CA 94105
Telephone: (415) 836-2500
Facsimile: (415) 836-2501

Attorneys for Defendant/Counterclaimant
DIAMOND FOUNDRY INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

E.Y. OROT ASSETS LTD., an Israeli
company, and OMEGA ECO DIAMONDS
LTD., an Israeli company,

Plaintiffs,

v.

DIAMOND FOUNDRY INC., a Delaware
corporation,

Defendant.

CASE NO.: 3:24-cv-03836-TLT

**JOINT NOTICE OF SETTLEMENT AND
STIPULATED REQUEST TO STAY
PROCEEDINGS & [PROPOSED] ORDER**

Action Filed: June 26, 2024

1 Plaintiffs/Counter-Defendants E.Y. Orot Assets Ltd. and Omega Eco Diamonds Ltd. (“Plaintiffs”)
2 and Defendant/Counterclaimant Diamond Foundry Inc. (“Foundry”) by and through their respective
3 counsel, hereby give notice to the Court of the settlement of the above captioned matter, and stipulate and
4 agree as follows:

5 WHEREAS, on June 26, 2024, Plaintiffs filed the Complaint for Domestication of Foreign
6 Judgment (the “Complaint”) [ECF No. 1];

7 WHEREAS, on November 29, 2024, Foundry filed an Answer to the Complaint and Counterclaim
8 (the “Counterclaim”) [ECF No. 47];

9 WHEREAS, on January 9, 2025, Foundry filed an Answer to the Complaint and Amended
10 Counterclaim [ECF No. 55];

11 WHEREAS, on January 24, 2025, Plaintiffs filed an Amended Complaint for Domestication of
12 Foreign Judgment [ECF No. 65];

13 WHEREAS, on February 12, 2025, the Parties engaged in a Settlement Conference before the
14 Hon. Magistrate Judge Kandis A. Westmore [ECF No. 68];

15 WHEREAS, at that Settlement Conference, the Parties agreed upon terms for settlement of
16 Plaintiffs’ Complaint, and of Foundry’s Counterclaim [*id.*];

17 WHEREAS, on March 19, 2025, the Parties executed a Settlement and Release Agreement (the
18 “Settlement Agreement”) memorializing the settlement terms agreed upon at the Settlement Conference;

19 WHEREAS, the Settlement Agreement requires that the Parties jointly seek a stay of all
20 proceedings relating to the Complaint, the Counterclaim, and all other claims, counterclaims, and third-
21 party claims with respect thereto, while the Parties satisfy the settlement consideration;

22 WHEREAS, the Settlement Agreement further requires that the settlement consideration be
23 satisfied within eight (8) months of the execution of the Settlement Agreement; AND

24 WHEREAS, the Settlement Agreement further requires that each Party file a Request for
25 Dismissal with Prejudice within seven (7) days of satisfaction of the settlement consideration.

26 BASED ON THE FOREGOING, THE PARTIES STIPULATE AND REQUEST AS FOLLOWS:

27 1. That the Court stay all proceedings relating to the Complaint, the Counterclaim, and all
28 other claims, counterclaims, and third-party claims with respect thereto, through December 1, 2025 or

1 until another date as ordered by the Court; and

2 2. That the Court set a Status Conference re: Dismissal in December 2025 for the Parties to
3 report on status of the matter, with a report due seven days before the Status Conference re: Dismissal, to
4 the extent the parties have not filed their Notices of Dismissal on or before that date.

5 **IT IS SO STIPULATED AND SO REQUESTED.**

6
7 DATED: March 20, 2025

GREENBERG TRAURIG, LLP

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9 By: /s/ Todd Pickles

10 TODD PICKLES
HENRY STROUD

11 Attorneys for Plaintiffs/Counter-Defendants
12 E.Y. OROT ASSETS LTD. and
13 OMEGA ECO DIAMONDS LTD.

14 DATED: March 20, 2025

DLA PIPER LLP (US)

15
16 By: /s/ James S. Davidson

17 JEFFREY E. TSAI
18 JAMES S. DAVIDSON

19 Attorneys for Defendant/Counterclaimant
20 DIAMOND FOUNDRY INC.
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SIGNATURE ATTESTATION

Pursuant to L.R. 5-1(h)(3), I hereby attest that all signatures listed above, and on whose behalf this filing is submitted, concur in the filings' content and have authorized this filing.

DATED: March 20, 2025

GREENBERG TRAURIG, LLP

By: /s/ Todd Pickles
Todd Pickles

[PROPOSED] ORDER

Upon review of the parties' stipulation and good cause appearing, it is hereby ordered that:

1. All proceedings relating to the Complaint, the Counterclaim, and all other claims, counterclaims, and third-party claims with respect thereto are hereby stayed through December 1, 2025, or until another date as ordered by the Court; and

2. A Status Conference re: Dismissal is set for December ____, 2025, at ____ am/pm in Courtroom 9 of the above captioned Court;

3. The Parties are ordered to file a Joint Status Report re: Dismissal on or before seven (7) days before the Status Conference re: Dismissal to the extent that the parties have not filed their respective dismissals on or before that date.

IT IS SO FOUND AND SO ORDERED.

Dated: _____

HON. TRINA L. THOMPSON
UNITED STATES DISTRICT JUDGE